

## UNITED STATES DISTRICT COURT

JUN 15 2011

## WESTERN DISTRICT OF LOUISIANA

TONY R. MOORE, CLERK  
BY MBD  
DEPUTY

## SHREVEPORT DIVISION

UNITED STATES OF AMERICA

\* CRIMINAL NO. 5:11CR00062

VERSUS

\* 18 U.S.C. 2252A(g)

WILLIAM BARTON (1)  
a.k.a. blackbart2010

\* 18 U.S.C. 2251(d)(1) &amp; (e)

\* 18 U.S.C. 2252A(a)(2)(A) &amp;(b)(1)

\*

CHRISTOPHER LUKE (2)  
a.k.a. Dank0420

\* JUDGE HICKS

\*

HENRY HAND (3)  
a.k.a. dfx

\* MAGISTRATE JUDGE HORNSBY

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JOHN DOE #4 (4)  
a.k.a. ee1

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JOHN DOE #5 (5)  
a.k.a. kfvicky1

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STEPHEN KINNEY (6)  
a.k.a. SocratesWasAGeek

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MATTHEW MCKEE (8)  
a.k.a. fantom  
a.k.a. fantomg  
a.k.a. B.J.hunnicutt

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JOHN DOE #9 (9)  
a.k.a. almeda

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RUSH BLANKENSHIP (11)  
a.k.a. 14yrsmax

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DAVID WHITTEN (12)  
a.k.a. davie

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JOHN DOE #13 (13)  
a.k.a. hardon

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JOHN DOE #14 a.k.a. gonzo	(14)	*
Jamil Lamar Mosley a.k.a. clubkidsforever	(15)	*
Anthony Paul Sowders a.k.a. ChanChadwick	(16)	*
Mohammed Jashimuddin N. Meah (17) a.k.a. juddinbest		*
JOHN DOE #18 a.k.a. biggniche090	(18)	*
JOHN DOE #19 a.k.a. winkee	(19)	*
JOHN DOE #20 a.k.a. c69janey	(20)	*
JOHN DOE #21 a.k.a. dd0040 a.k.a. slapalot	(21)	*

#### **SUPERCEDING INDICTMENT**

#### **THE GRAND JURY CHARGES:**

##### **COUNT 1**

##### **Engaging in a Child Exploitation Enterprise 18 U.S.C. 2252A(g)**

Beginning on or about the 8<sup>th</sup> day of January, 2008, and continuing until on or about the 31<sup>st</sup> day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, WILLIAM BARTON a.k.a. blackbart2010, CHRISTOPHER LUKE a.k.a. Dank0420, HENRY HAND a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kfvicky1, STEPHEN KINNEY a.k.a. SocratesWasAGeek, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, RUSH BLANKENSHIP a.k.a. 14yrsmax, DAVID WHITTEN a.k.a davie, JOHN DOE #13 a.k.a.

hardon, JOHN DOE #14 a.k.a gonzo, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, JOHN DOE #18 a.k.a. biggniche090, JOHN DOE #19 a.k.a. winkee, JOHN DOE #20 a.k.a. c69janey, JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot and others known and unknown to the Grand Jury, did engage in a child exploitation enterprise, as more fully described below:

### **THE ENTERPRISE**

The Defendants were members of an Internet-based members-only bulletin board, entitled Dreamboard, (hereafter Dreamboard), the purpose of which was, among other things, the advertisement and distribution of child pornography. For purposes of this indictment, the term "child pornography" is as defined in Title 18 United States Code, Section 2256(8)(a).

Dreamboard was hosted by Certified Hosting Solutions, Inc. (hereafter Certified). Certified is a commercial web hosting company that was paid to host Dreamboard through a credit card associated with a Dreamboard member, who was a co-conspirator in the criminal activity.

The administrators of Dreamboard had specific requirements for allowing new members to join the board. Each member was required to post child pornography in order to become a member. Furthermore, in order for Dreamboard members to remain in good standing and avoid removal from the board, each member had to continue to post images of child pornography on Dreamboard.

In order to advertise the child pornography, members would post a description of the child pornography that they were making available for distribution. Some advertisements included sample images of the child pornography. In the advertisement,

the members posting the advertisements provided the web site address where the child pornography was located and a password necessary to download the material.

All members of Dreamboard were encouraged and required to post images and videos of child pornography so that all members would have a massive and private library of child pornography available for viewing or download by members.

### **THE RULES OF DREAMBOARD**

The rules of Dreamboard were printed in English, Russian, Japanese and Spanish, and were specific regarding the types of images that had to be posted in order to qualify for admission to Dreamboard. Those rules stated, in pertinent part:

- a. "If I see posts of girls with great big tits and a big black hairy bush, then you can fucking forget being made a member."
- b. "Keep the girls under 13, in fact, I really need to see 12 or younger to know your [sic] a brother."
- c. And don't avoid nudity in previews. I will NOT accept you, if theres [sic] no nudity. And my definition of nudity is pussy or anal in the shot. You just waste your own time if you don't do this. Because you will not get in, if you don't follow the rules."

The rules of Dreamboard had the following warnings posted which required members to continue to post child pornography or lose access to the Dreamboard:

- a. "If you haven't UPLOADED in 50 days, & login doesn't [sic] work, re-apply, because you have been DELETED."
- b. "Uploaders remain, TALKERS AND LURKERS who DON'T upload are deleted."

The rules of Dreamboard allowed members to join different sections of the board. One section of Dreamboard was titled "Super Hardcore." The rules controlling what could be posted in that section were as follows:

"Its very young kids, getting fucked, and preteens in distress, and or crying, ect... Getting hit hard on the ass, with a belt and so on . . I can't believe some of you guys can't work it out for yourselves? And "pretend" bondage, "Pretend light whipping" is not super hardcore. If the girl looks totall comfortable, she's not in distress, it does NOT belong I this section [smiley-face icon]"

Members of the Dreamboard were segregated into groups. If one were given membership to the Dreamboard, the administrator would dictate in which group the member would be placed. Each group of members had access to specific locations on the internet bulletin board where child pornography was advertised.

According to the rules of Dreamboard, groups included "Super VIP.", "Super VIP", VIP, and member.

According to the rules of Dreamboard, "Super VIP." members were producers of child pornography that advertised child pornography that they had produced as well as other child pornography that they offered for distribution.

According to the rules of Dreamboard, those who had attained the second highest level of membership, "Super VIP" members, were considered trusted members of the web site. As such they were able to see more posted advertisements than other members.

According to the rules of Dreamboard, the final two levels of membership were VIP members and members. Members of these levels have access to a restricted supply of child pornography. In order to move to a higher group on the Dreamboard and thereby obtain a broader access to child pornography, members must post more

advertisements for child pornography, post advertisements for child pornography the member had produced, or post advertisements for child pornography that no other member possessed.

According to the rules of Dreamboard, members were to use encryption technologies in order to prevent detection. The rules went on to specify which encryption technologies should be used and which should be avoided.

Dreamboard members did not use their real names, but instead used screen names to conceal their identities. At all relevant time, each of the named defendants were members of Dreamboard.

**VIOLATIONS OF CHILD PORNOGRAPHY STATUTES COMMITTED BY THE  
CHILD EXPLOITATION ENTERPRISE**

The child exploitation enterprise and the members therein, in concert with three or more persons, engaged in a series of three or more felony violations of Title 18 United States Code, Section 2251(d)(1), that is, advertising the display and/or distribution of child pornography, constituting three or more separate incidents and involved more than one victim. The advertisements included but are not limited to, the advertisements described more fully below:

1. On or about the 19<sup>th</sup> day of May, 2010, WILLIAM BARTON a.k.a. blackbart2010, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Goldbergvideos-visitors.avi*, which contained child pornography.
2. On or about the 8<sup>th</sup> day of June, 2010, WILLIAM BARTON a.k.a. blackbart2010, did knowingly publish on the Dreamboard Internet Bulletin

Board an advertisement offering to distribute the file entitled *Pedo-Vicky-The 107.mpeg*, which contained child pornography.

3. On or about the 19<sup>th</sup> day of June, 2010, WILLIAM BARTON a.k.a. blackbart2010, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *14.mpg*, which contained child pornography.
4. On or about the 8<sup>th</sup> day of August, 2009, CHRISTOPHER LUKE a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *A bunch of somewhat random pics*, which contained child pornography.
5. On or about the 5<sup>th</sup> day of November, 2009, CHRISTOPHER LUKE a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *AnyaCool\_Sc*, which contained child pornography.
6. On or about the 13<sup>th</sup> day of February, 2010, CHRISTOPHER LUKE a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *(Pthc) HCB2-vhs-14.avi*, which contained child pornography.
7. On or about the 13<sup>th</sup> day of August, 2009, HENRY HAND a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *LS Magazine Issue 16*, which contained child pornography.
8. On or about the 6<sup>th</sup> day of May, 2010, HENRY HAND a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *Elia-001.avi*, which contained child pornography.

9. On or about the 14<sup>th</sup> day of June, 2010, HENRY HAND a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Jenny 9yo Daughter-TV View 05.2007.avi*, which contained child pornography.
10. On or about the 27<sup>th</sup> of July, 2009, JOHN DOE #4 a.k.a. ee1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *!!NEW!! Pthc ((Hussyfan)) nablot\_1.avi*, which contained child pornography.
11. On or about the 1<sup>st</sup> day of August, 2009, JOHN DOE #4 a.k.a. ee1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Sami-RaveVib1.mpg*, which contained child pornography.
12. On or about the 17<sup>th</sup> day of October, 2009, JOHN DOE #4 a.k.a. ee1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Girl 4yo Bald Pussy Rubbing #100-1937.mov*, which contained child pornography.
13. On or about the 22<sup>nd</sup> day of September, 2009, JOHN DOE #5 a.k.a. kfvicky1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *toddler - man trying to penetrate toddler girl 3yo Gets It Every Way Imaginable.mpg*, which contained child pornography.

14. On or about the 28<sup>th</sup> day of October, 2009, JOHN DOE #5 a.k.a. kfvicky1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *ann - ((Kingpass)) New Ann Forest 02 (At Last She Gets It).avi*, which contained child pornography.
15. On or about the 22<sup>nd</sup> day of April, 2010, JOHN DOE #5 a.k.a. kfvicky1, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *St.Petersburg-104.avi*, which contained child pornography.
16. On or about the 6<sup>th</sup> day of March, 2010, STEPHEN KINNEY a.k.a. SocratesWasAGeek, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lolita Collection Vol1.avi*, which contained child pornography.
17. On or about the 7<sup>th</sup> day of March, 2010, STEPHEN KINNEY a.k.a. SocratesWasAGeek, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *E-1 (lesbian).mpg*, which contained child pornography.
18. On or about the 17<sup>th</sup> day of March, 2010, STEPHEN KINNEY a.k.a. SocratesWasAGeek, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Cambodia2 Anal And 3Bj.avi*, which contained child pornography.
19. On or about the 12<sup>th</sup> day of May, 2010, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, did knowingly publish on the

Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *My Little Girls.wmv*, which contained child pornography.

20. On or about the 21<sup>st</sup> day of May, 2010, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vicky SuckCum001.mpg*, which contained child pornography.
21. On or about the 12<sup>th</sup> day of June, 2010, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Collection of bj pix*, which contained child pornography.
22. On or about the 27<sup>th</sup> day of April, 2010, JOHN DOE #9 a.k.a. almeda, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *!new 2010 sweetbabys in bed – hot show!!.wmv*, which contained child pornography.
23. On or about the 7<sup>th</sup> day of June, 2010, JOHN DOE #9 a.k.a. almeda, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Mule 2009*, which contained child pornography.
24. On or about the 10<sup>th</sup> day of June, 2010, JOHN DOE #9 a.k.a. almeda, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Varoious Sets*, which contained child pornography.

25. On or about the 24<sup>th</sup> day of April, 2010, RUSH BLANKENSHIP a.k.a. 14yrsmax, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Girl with Dog 001.avi*, which contained child pornography.
26. On or about the 8<sup>th</sup> day of May, 2010, RUSH BLANKENSHIP a.k.a. 14yrsmax, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Nice small sets*, which contained child pornography.
27. On or about the 24<sup>th</sup> day of May, 2010, RUSH BLANKENSHIP a.k.a. 14yrsmax, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Candle.avi*, which contained child pornography.
28. On or about the 6<sup>th</sup> day of November, 2009 at 04:34 p.m., DAVID WHITTEN a.k.a. davie, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vicky Pedophilia – The Secret Movie.wmv*, which contained child pornography.
29. On or about the 6<sup>th</sup> day of November, 2009 at 07:43 p.m., DAVID WHITTEN a.k.a. davie, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rmix-04.bin*, which contained child pornography.
30. On or about the 7<sup>th</sup> day of November, 2009, DAVID WHITTEN a.k.a. davie, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *2006 Tara 8yr – littlr ass busted out – December 2006.avi*, which contained child pornography.

31. On or about the 16<sup>th</sup> day October, 2009, JOHN DOE #13 a.k.a. hardon, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *babyshivid-bathtime-inourworld\_all.avi* which contained child pornography.
32. On or about the 11<sup>th</sup> day of November, 2009, JOHN DOE #13 a.k.a. hardon, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Matt, Clayton and Simon*, which contained child pornography.
33. On or about the 2<sup>nd</sup> day of June, 2010, JOHN DOE #13 a.k.a. hardon, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vasia\_Trio's\_1-7(22min12sec).mpg*, which contained child pornography.
34. On or about the 1<sup>st</sup> day of November, 2009, JOHN DOE #14 a.k.a. gonzo, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Need your help*, which contained child pornography.
35. On or about the 5<sup>th</sup> day of November, 2009, JOHN DOE #14 a.k.a. gonzo, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rona videos from set 31*, which contained child pornography.
36. On or about the 6<sup>th</sup> day of November, 2009, JOHN DOE #14 a.k.a. gonzo, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Gracel videos from set 32*, which contained child pornography.

37. On or about the 16<sup>th</sup> day of May, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *RF#4\_001(inc).mpg*, which contained child pornography.
38. On or about the 17<sup>th</sup> day of May, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Home Made Sets*, which contained child pornography.
39. On or about the 8<sup>th</sup> day of June, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rodrigo*, which contained child pornography.
40. On or about the 20<sup>th</sup> day of May, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *original dancer (2).flv*, which contained child pornography.
41. On or about the 26<sup>th</sup> day of May, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *YouTube – sexy video.flv*, which contained child pornography.
42. On or about the 7<sup>th</sup> day of June, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *em.avi*, which contained child pornography.

43. On or about the 21<sup>st</sup> day of April, 2010, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *10008 Kgirl\_(with sound finally).avi*, which contained child pornography.
44. On or about the 24<sup>th</sup> day of April, 2010 at 07:32 am, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *10009 Kids Sex.avi*, which contained child pornography.
45. On or about the 24<sup>th</sup> day of April, 2010 at 07:33 am, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *100010 Lolitabeach Hidden Camera.avi*, which contained child pornography.
46. On or about the 2<sup>nd</sup> day of March, 2010, JOHN DOE #18 a.k.a. biggniche090, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *(pthc) 6yo-Gretchen-Doing It In sleep-NEW.mpg*, which contained child pornography
47. On or about the 11<sup>th</sup> day of May, 2010, JOHN DOE #18 a.k.a. biggniche090, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *[2009-05][for private only] PARTECITA2.wmv*, which contained child pornography
48. On or about the 10<sup>th</sup> day of June, 2010, JOHN DOE #18 a.k.a. biggniche090, did knowingly publish on the Dreamboard Internet Bulletin

Board an advertisement offering to distribute the file entitled Kassandra\_2.avi (11yo chubby inserts hotdog in vagina), which contained child pornography

49. On or about the 15<sup>th</sup> day of May, 2010, JOHN DOE #19 a.k.a. winkee, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Image board stuff from 15 mos ago, which contained child pornography
50. On or about the 2<sup>nd</sup> day of June, 2010, at 8:20, JOHN DOE #19 a.k.a. winkee, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Savannah Set, which contained child pornography
51. On or about the 2<sup>nd</sup> day of June, 2010, at 9:30, JOHN DOE #19 a.k.a. winkee, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled my Rose Buds, which contained child pornography
52. On or about the 24<sup>th</sup> day of May, 2009, JOHN DOE #20 a.k.a. c69janey, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Dark robbery Vid-Hawk Sanity 'robbed', which contained child pornography
53. On or about the 27<sup>th</sup> day of May, 2009, JOHN DOE #20 a.k.a. c69janey, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 1hr14min of VICKY!, which contained child pornography

54. On or about the 14<sup>th</sup> day of November, 2009, JOHN DOE #20 a.k.a. c69janey, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Whole Lotta Vicky {2.17 G towards VIP], which contained child pornography.
55. On or about the 11<sup>th</sup> day of October, 2009, at 5:55 a.m., JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled =005.wmv, which contained child pornography.
56. On or about the 11<sup>th</sup> day of October, 2009, at 9:59 a.m., JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled O-Dvd 003.avi, which contained child pornography.
57. On or about the 31<sup>st</sup> day of October, 2009, JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 05\_carmen\_pops.avi, which contained child pornography.

All in violation of Title 18 United States Code, Section 2252A(g) [18 U.S.C. 2252A(g)].

COUNT 2

**Conspiracy to Advertise the  
Distribution of Child Pornography  
18 U.S.C. 2251(d)(1) & (e)**

Beginning on or about the 8<sup>th</sup> day of January, 2008, and continuing until on or about the 31<sup>st</sup> day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, WILLIAM BARTON a.k.a. blackbart2010, CHRISTOPHER LUKE a.k.a. Dank0420, HENRY HAND a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kfvicky1, STEPHEN KINNEY a.k.a. SocratesWasAGeek, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, RUSH BLANKENSHIP a.k.a. 14yrsmax, DAVID WHITTEN a.k.a davie, JOHN DOE #13 a.k.a. hardon, JOHN DOE #14 a.k.a gonzo, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, JOHN DOE #18 a.k.a. biggniche090, JOHN DOE #19 a.k.a. winkee, JOHN DOE #20 a.k.a. c69janey, JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of advertising the display and/or distribution of child pornography in violation of Title 18 United States Code, Section 2251(d)(1).

**MANNER AND MEANS OF THE CONSPIRACY**

The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy to advertise the distribution of child pornography.

All in violation of Title 18 United States Code, Section 2251(d)(1) &(e).

COUNT 3

**Conspiracy to Distribute Child Pornography  
18 U.S.C. 2252A(a)(2)(A) & (b)(1)**

Beginning on or about the 8<sup>th</sup> day of January, 2008, and continuing until on or about the 31<sup>st</sup> day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, WILLIAM BARTON a.k.a. blackbart2010, CHRISTOPHER LUKE a.k.a. Dank0420, HENRY HAND a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kfvicky1, STEPHEN KINNEY a.k.a. SocratesWasAGeek, MATTHEW MCKEE a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, RUSH BLANKENSHIP a.k.a. 14yrsmax, DAVID WHITTEN a.k.a davie, JOHN DOE #13 a.k.a. hardon, JOHN DOE #14 a.k.a gonzo, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, JOHN DOE #18 a.k.a. biggniche090, JOHN DOE #19 a.k.a. winkee, JOHN DOE #20 a.k.a. c69janey, JOHN DOE #21 a.k.a. dd0040, a.k.a. slapalot and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of distribution of child pornography in violation of Title 18 United States Code, Section 2252A(a)(2)(A).

**MANNER AND MEANS OF THE CONSPIRACY**

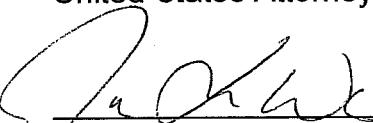
The United States adopts the factual allegations presented in Count 1 of the Superceding Indictment as the manner and means of the conspiracy to distribute child pornography.

All in violation of Title 18 United States Code, Section 2252A(a)(2)(A) & (b)(1).

A TRUE BILL:

**REDACTED**

STEPHANIE A. FINLEY  
United States Attorney

  
JOHN LUKE WALKER Bar # 18077  
Assistant United States Attorney  
800 Lafayette Street, Suite 2200  
Lafayette, Louisiana 70501-6832  
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